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16 **UNITED STATES DISTRICT COURT**
17
18 **NORTHERN DISTRICT OF CALIFORNIA**
19
20 **SAN FRANCISCO DIVISION**

21 IN RE: UBER TECHNOLOGIES, INC.,
22 PASSENGER SEXUAL ASSAULT
23 LITIGATION

Case No. 3:23-md-03084-CRB

24 **DECLARATION OF DAVID M. GRIMES**
25 **IN SUPPORT OF LEVIN SIMES**
26 **PLAINTIFFS' OPPOSITION TO**
27 **DEFENDANTS UBER TECHNOLOGIES,**
28 **INC., RASIER, LLC, AND RASIER-CA,**
LLC'S MOTION TO DISMISS CASES FOR
FAILURE TO COMPLY WITH PTO 31
AND SHOW-CAUSE ORDERS

29 This Document Relates to:

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31 *Jane Doe LS 333 v. Uber Technologies, Inc., et*
32 *al., Case No. 3:23-cv-05930-CRB*

33 *Jane Doe LS 397 v. Uber Technologies, Inc., et*
34 *al., Case No. 3:23-cv-05944-CRB*

35 *Jane Doe LS 245 v. Uber Technologies, Inc., et*
36 *al., Case No. 3:24-cv-05864-CRB*

37 *Jane Doe LS 134 v. Uber Technologies, Inc., et*
38 *al., Case No. 3:23-cv-03811-CRB*

39 *Jane Doe LS 364 v. Uber Technologies, Inc., et*
40 *al., Case No. 3:23-cv-05237-CRB*

Judge: Honorable Charles R. Breyer
Date: January 16, 2026
Time: 10:00 a.m.
Courtroom: 6 – 17th Floor

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Jane Doe LS 234 v. Uber Technologies, Inc., et al., Case No. 3:23-cv-05433-CRB

Jane Doe LS 322 v. Uber Technologies, Inc., et al., Case No. 3:23-cv-05572-CRB

Jane Doe LS 191 v. Uber Technologies, Inc., et al., Case No. 3:23-cv-05573-CRB

Jane Doe LS 185 v. Uber Technologies, Inc., et al., Case No. 3:23-cv-05922-CRB

Jane Doe LS 303 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05980-CRB

John Doe LS 6 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05316-CRB

Jane Doe LS 54 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05387-CRB

Jane Doe LS 406 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05836-CRB

Jane Doe LS 420 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05739-CRB

John Doe LS 5 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05853-CRB

Jane Doe LS 421 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05941-CRB

Jane Doe LS 430 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05743-CRB

Jane Doe LS 232 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05327-CRB

Jane Doe LS 136 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05475-CRB

Jane Doe LS 296 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-06021-CRB

Jane Doe LS 291 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-06020-CRB

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Jane Doe LS 135 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05971-CRB

Jane Doe LS 440 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05862-CRB

Jane Doe LS 304 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05914-CRB

Jane Doe LS 215 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05909-CRB

Jane Doe LS 214 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05777-CRB

Jane Doe LS 125 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05982-CRB

Jane Doe LS 368 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05898-CRB

Jane Doe LS 173 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05885-CRB

Jane Doe LS 206 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05419-CRB

John Doe LS 3 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05760-CRB

Jane Doe LS 548 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-09211-CRB

Jane Doe LS 553 v. Uber Technologies, Inc., et al., Case No. 3:25-cv-01493-CRB

Jane Doe LS 554 v. Uber Technologies, Inc., et al., Case No. 3:25-cv-01693-CRB

Jane Doe LS 583 v. Uber Technologies, Inc., et al., Case No. 3:25-cv-02801-CRB

Jane Doe LS 582 v. Uber Technologies, Inc., et al., Case No. 3:25-cv-02792-CRB

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1 *Jane Doe LS 593 v. Uber Technologies, Inc., et*
2 *al., Case No. 3:25-cv-03269-CRB*

3 *Jane Doe LS 598 v. Uber Technologies, Inc., et*
4 *al., Case No. 3:25-cv-04071-CRB*

5 *Jane Doe LS 601 v. Uber Technologies, Inc., et*
6 *al., Case No. 3:25-cv-04699-CRB*

7 *Jane Doe LS 616 v. Uber Technologies, Inc., et*
8 *al., Case No. 3:25-cv-05942-CRB*

9 *Jane Doe LS 614 v. Uber Technologies, Inc., et*
10 *al., Case No. 3:25-cv-05884-CRB*

11 *Jane Doe LS 620 v. Uber Technologies, Inc., et*
12 *al., Case No. 3:25-cv-06249-CRB*

13 *Jane Doe LS 619 v. Uber Technologies, Inc., et*
14 *al., Case No. 3:25-cv-06243-CRB*

15 *Jane Doe LS 622 v. Uber Technologies, Inc., et*
16 *al., Case No. 3:25-cv-06306-CRB*

17 *Jane Doe LS 626 v. Uber Technologies, Inc., et*
18 *al., Case No. 3:25-cv-06541-CRB*

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I, David M. Grimes declare as follows:

1. I am an attorney who is duly licensed to practice law before all courts of the State of California. I am an attorney at the law firm Levin Simes LLP, and counsel of record for all Jane Doe LSA and Jane Doe LS Plaintiffs in MDL No. 3084. I make this declaration of my personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.
2. Throughout October I exchanged emails with Uber attorney Chris Cotton concerning Uber's accusation that Plaintiffs LS 333 and LS 397 submitted non-bona fide receipts. ECF 4206-2. In those emails I explained to Mr. Cotton our clients' positions that no documents responsive to the Court's order that they produce documents relating to the generation of fraudulent receipts existed, and explained that if he did not find that statement credible, he was free to depose them as ordered by the Court.
3. Our firm moved to withdraw from the representation following our clients' assertions that no responsive documents exist. ECF 4146. The Court denied that motion. ECF 4167.
4. Nothing in the prior orders required our Plaintiffs to provide a written declaration that no responsive documents exist, or provide a written explanation for the absence of documents. The procedure for resolving questions about a claimed absence of documents was, to my understanding, for Uber to depose the plaintiffs who submitted them under the abbreviated timeline called for in the order.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 5, 2025, in San Francisco, California.

Respectfully Submitted,

LEVIN SIMES LLP

/s/ David M. Grimes

David M. Grimes

Attorney for Levin Simes Plaintiffs